

IN RE

DELPHI CORPORATION, et al, DEBTORS
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
CHAPTER 11
CASE NO 05-4481 (RDD)

NOTICE OF MOTION FOR ORDER UNDER 11 U.S.C. § 105,
363(b)(1), AND 1108 CONFIRMING DEBTORS' AUTHORITY TO
TERMINATE EMPLOYER-PAID POST RETIREMENT HEALTH
CARE BENEFITS AND EMPLOYER-PAID POST RETIREMENT
LIFE INSURANCE BENEFITS FOR CERTAIN (A) SALARIED
EMPLOYEES AND (B) RETIREES AND THEIR SURVIVING
SPOUSES.

TO: THE HONORABLE ROBERT D. DRAIN, UNITED STATES
BANKRUPTCY JUDGE; DELPHI CORPORATION (ATT'N
GENERAL COUNSEL); SKADDEN, ARPS, MEAGHER &
FLOM LLP (ATT'N JOHN WM. BUTLER, JR); DAVIS POLK
& WARDWELL (ATT'N DONALD BERNSTEIN AND BRIAN
RESNICK); LATHAN & WATKINS LLP (ATT'N ROBERT J.
ROSENBERG AND MARK A. BROUDER; FRIED, FRANK, HARRIS,
SHRIVER & JACOBSON LLP (ATT'N BONNIE STEINGART);
AND THE OFFICE OF THE UNITED STATES TRUSTEE FOR
THE SOUTHER DISTRICT OF NEW YORK (ATT'N BRIAN
MASUMOTO)

2-11-09 OBJECTIONS TO MOTION

THIS PLEADING, IF PERMITTED, WOULD REMOVE SOME
"LEGACY COSTS" NOW SHOWN ON DELPHI'S BOOKS
AS A RESULT OF TERMINATING MY AND 15,000
OTHERS HEALTH AND LIFE INSURANCE POST RETIREMENT
BENEFITS (OPEB)

DELPHI ARGUES AGAIN AND AGAIN THAT THEY RETAIN THE AUTHORITY TO MODIFY OR TERMINATE THEIR DISCRETIONARY SALARIED OPEB PROGRAMS. BUT THIS ARGUMENT AND ALL THE OTHER DATA, ARGUMENTS AND BUSINESS CONDITIONS DO NOT RECOGNIZE WHAT "LEGACY BENEFITS" DELPHI CONTINUES TO ENJOY DUE TO MY AND 75,000 OTHERS' CONTRIBUTIONS.

IN PARAGRAPH 17, DELPHI STATES

"THE COMPANY IS A LEADING GLOBAL TECHNOLOGY INNOVATOR WITH SIGNIFICANT ENGINEERING RESOURCES AND TECHNICAL COMPETENCIES IN A VARIETY OF DISCIPLINES AND IS ONE OF THE LARGEST GLOBAL SUPPLIERS OF VEHICLE ELECTRONICS, TRANSPORTATION COMPONENTS, INTEGRATED SYSTEMS AND MODULES AND OTHER ELECTRONIC TECHNOLOGY

OUR "LEGACY BENEFITS" CONTRIBUTE SIGNIFICANTLY TO THE VALUE PARAGRAPH 17 STATES THAT DELPHI NOW ENJOYS

THESE COMPETENCIES ARE IN PART BUILT UPON IDEAS, INNOVATIONS, PATENTS, GOOD WILL & HARD WORK WE CONTRIBUTED TO DELPHI

"SINCE THESE "LEGACY BENEFITS" ARE NOT EASILY ACCOUNTABLE IN DOLLARS, AND THE "LEGACY COSTS" HAVE EASILY COMPUTED DOLLARS THAT COULD BE ELIMINATED, I PLEAD TO NOT ONLY CONSIDER COST AVOIDANCE BY TERMINATING OUR OPEB BUT TO RECOGNIZE OUR CONTRIBUTIONS NEVER SHOWN ON DELPHI'S BOOKS.

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PLEASE DENY DELPHI'S MOTION TO TERMINATE
OUR OPEB. RECOGNIZE OUR "LEGACY BENEFITS"
TO DELPHI'S CURRENT VALUE. PLEASE RESTORE
CURRENT RETIREE MEDICAL AND INSURANCE BENEFITS SHOWN
ON PAGE 22 & 23 OF THE MOTION.
RESPECTIVELY SUBMITTED BY:

Paul C. Morrin

PAUL C. MORRIN
DELPHI RETIREE MAY 1, 2002

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